IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RYLIN TURLEY,

Defendant.

) Criminal No. 5:24-CR-366 (BKS)  
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) Indictment

) Violations: 18 U.S.C. § 2252A(a)(1)  
)[Transportation of Child  
Pornography]

) 18 U.S.C. § 2252A(a)(5)(B) &  
(b)(2)  
)[Possession of Child  
Pornography]

) 2 Counts and 1 Forfeiture Allegation

) County of Offense: Jefferson

**THE GRAND JURY CHARGES:****COUNT 1**  
**[Transportation of Child Pornography]**

On or about August 3, 2024, in Jefferson County in the Northern District of New York, and elsewhere, the defendant, RYLIN TURLEY, did knowingly transport child pornography in and affecting interstate and foreign commerce by any means, including by computer, in that the defendant transported an Apple iPhone 15 Plus, bearing serial number GVQM629N7W, from Canada into the United States at the Alexandria Bay Port of Entry, knowing that it contained one or more graphic image and video files of a minor or minors engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(1).

**COUNT 2**  
**[Possession of Child Pornography]**

On or about August 3, 2024, in Jefferson County in the Northern District of New York, the defendant, **RYLIN TURLEY**, did knowingly possess material that contained one or more images of child pornography that had been shipped and transported using a means and facility of interstate and foreign commerce, and in and affecting such commerce by any means, including by computer, and that was produced using materials that had been shipped and transported in and affecting such commerce by any means, including by computer, that is, an Apple iPhone 15 Plus, bearing serial number GVQM629N7W, manufactured outside of the State of New York, which contained numerous graphic image and video files of minors engaged in sexually explicit conduct, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

This violation involved one or more images of child pornography involving a prepubescent minor and a minor who had not attained 12 years of age, in violation of Title 18, United States Code, Section 2252A(b)(2).

**FORFEITURE ALLEGATION**

The allegations in Counts 1 and 2 of this indictment are hereby realleged and incorporated by reference herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253(a)(3), upon conviction of the charges alleged in Counts 1 and 2, the defendant, **RYLIN TURLEY**, shall forfeit to the United States of America any property, real and personal, used and intended to be used to commit and to

promote the commission of the offense. The property subject to forfeiture includes, but is not limited to, an Apple iPhone 15 Plus, bearing serial number GVQM629N7W.

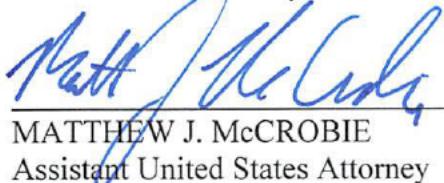
Dated: August 29, 2024

A TRUE BILL, \*Name redaction

\_\_\_\_\_  
Grand Jury Foreperson

CARLA B. FREEDMAN  
United States Attorney

By:

  
MATTHEW J. McCROBIE  
Assistant United States Attorney  
Bar Roll No. 702739